

IN THE UNITED STATES DISTRICT COURT
OF THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION

HOLLY ANN SACKS, Individually and as Representative of the Estate of RICHARD TODD SACKS, MELVIN PHILLIP SACKS, and MARILYN PROCTOR,	§	
Plaintiffs,	§	CIVIL ACTION
	§	NO. 5:04-CV-73
V.	§	
FOUR SEASONS HOTELS LIMITED AND FOUR SEASONS PUNTA MITA, S.A. de C.V.,	§	
Defendants.	§	

**PLAINTIFF HOLLY SACKS' REPLY IN SUPPORT OF HER
FOURTH MOTION TO COMPEL ANSWERS TO REQUESTS
FOR PRODUCTION FROM DEFENDANTS**

Plaintiff Holly Sacks files this Reply in Support of her Fourth Motion to Compel Answers to Requests for Production from Defendants, and state as follows:

Defendants have not confessed to feasibility, but rather continue to assert that it was not practical to maintain a standard of medical services that Plaintiffs suggest. Obtaining the requested information from Defendants is relevant, and/or is reasonably calculated to lead to discovery of admissible evidence, to show what Four Seasons did at one facility to address the risk and to fix the same issue was feasible and could have been done at the subject Punta Mita resort.

**PLAINTIFF HOLLY SACKS' REPLY IN SUPPORT OF HER FOURTH MOTION TO
COMPEL ANSWERS TO REQUESTS FOR PRODUCTION FROM DEFENDANTS– Page 1**

WHEREFORE, Plaintiff Holly Sacks asks the Court strike all of the objections raised by Defendants to the above-mentioned requests for production, and order Defendants to respond to the Discovery within ten (10) days, and for such other and further relief to which Plaintiff Holly Sacks may be justly entitled both at law and equity.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above document has been served upon all counsel listed below on this 3rd day of January, 2008.

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